

201-15737



December 8, 2004

Mr. Jeffrey A. Taylor
U. S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Chemical Control Division
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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Re: HPV Challenge Program

Dear Mr. Taylor:

In response to your inquiry, this will confirm that Syngenta Crop Protection, Inc. will continue Zeneca Inc.'s sponsorship of three chemical substances under the HPV Challenge Program. These three substances are:

1. Isophthalonitrile (CAS # 626-17-5);
2. Benzonitrile, 3-methyl (CAS # 620-22-4); and
3. 4,4'-bipyridyl (CAS # 553-26-4).

Zeneca Ag Products, a business unit of Zeneca Inc., submitted a letter to the EPA dated November 29, 1999 agreeing to sponsor each of these three substances under the HPV Challenge Program. As we informed you by E-mail, Zeneca Ag Products merged into Novartis Crop Protection, and Novartis Crop Protection changed its name to Syngenta Crop Protection. Therefore, Syngenta Crop Protection, Inc. is the successor to Zeneca Inc.'s commitment to sponsor these chemicals.

We are gathering existing data on isophthalonitrile, 3-methyl benzonitrile, and 4,4'-bipyridyl and will submit robust summaries of the studies, along with a test plan for any additional testing deemed necessary, by June 2005.

We appreciate your ongoing communication with us. William Secrest ((336) 632-2539) and Chip Witcher ((336) 632-6437) are Syngenta Crop Protection's technical contacts for these substances, and please call either of them if you have any questions.

Very truly yours,

John A. Licata
Head, Health, Safety, Environment &
Quality